

I IN THE U.S. DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRIAN NEEFE, individually and	:	
As next of friend to LACEY KNUTSEN	:	
Plaintiffs,	:	
v.	:	C.A. No.: 04-366-KAJ
GARY LAYFIELD AND DELAWARE	:	JURY TRIAL OF SIX
STATE POLICE,	:	DEMANDED
Defendants.	:	

PLAINTIFF'S INITIAL DISCLOSURE
PURSUANT TO FED.R.CIV.P.26(a)(1)

Plaintiff, Brain Neeffe, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, provides the following as her initial disclosures in the above-captioned case.

A. **Individuals Likely to Have Discoverable Information**

The following individuals, who may be contacted through counsel for the Plaintiff may have discoverable information in support of our claim.

- A. (1) Plaintiff
- (2) Linda Knutsen, Plaintiff's girlfriend
- (3) Rodney Layfield
- (4) Personnel from Delaware State Police
- (5) Individuals at the Road House , names to be supplemented.

B. **Documents, Data, Compilation, and Tangible Things in the Custody or Control of the Plaintiff.**

None

C. **Computation of Damages:**

Punitive Damages \$50,000.00

Compensatory Damages \$50,000.00

D. **Insurance/Indemnity Information**

None.

Plaintiff acknowledges and recognizes her continuing obligation to turn over discoverable material.

LAW OFFICE OF
EDWARD C. GILL, P.A.

/s/
Edward C. Gill, Esquire
Bar ID No.: 2112
16 North Bedford Street
P.O. Box 824
Georgetown, Delaware 19947
302-854-5400
ed@de-law.com

Dated: